

*Law Office of
Francisco E. Celedonio, Esq.
401 Broadway, 25th Flr.
New York, New York 10013*

MEMO ENDORSED

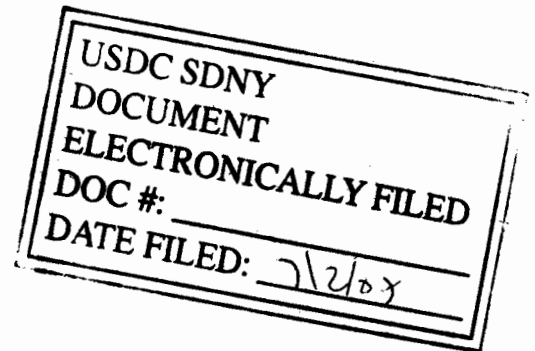
(212) 219-7533

Fax (212) 219-4094

June 22, 2007

VIA FACSIMILE

Honorable Kenneth M. Karas
United States District Judge
United States District Court
Southern District of New York
New York, New York 10007



Re: *United States v. Hassan Osman*,
06 Cr. 1192 (KMK)

Dear Judge Karas:

As the Court is aware, the above-named defendant was initially presented before a United States Magistrate Judge on July 16, 2006 and ultimately released on the following bail package: (i) a \$150,000 PRB; (ii) co-signed by three (3) FRP; (iii) secured by \$7,500 in cash and real property in Minnesota with an equity of \$150,000; (iv) travel limits to the Southern District of New York and the district of Minnesota, where Mr. Osman resides; and (v) surrender of travel documents.

Throughout the pendency of this action I have been in constant contact with Mr. Osman, he has been in full compliance with all bail conditions, and he is gainfully employed.

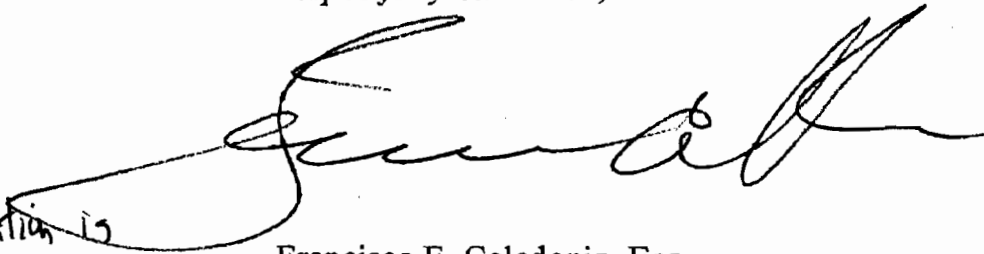
At a conference earlier this week I advised the Court that Mr. Hassan would like to accompany his wife and children on a summer vacation trip to Niagara Falls. Mr. Hassan has already purchased tickets for his family and they will be traveling beginning on Monday June 25, 2007, returning to Minneapolis on July 14, 2007. The proposed travel would entail entering Canada, although Mr. Hassan informs me that he does not need a passport to enter Canada.

Earlier today I spoke to AUSA Daniel Stein who informs me the government will not consent to the travel application, although he does not articulate a specific basis. I am informed, however, that Pre trial Services does not oppose the travel.

I recognize that, ordinarily, travel abroad might raise issues of risk of flight. Under the circumstances of this case, however, we submit that there is no such concern in the case of Mr. Hassan Osman. As the Court is aware, Mr. Osman has sought, and obtained, the Court's permission to travel on various occasions, and he has complied with all conditions imposed by the Court. Additionally, on the single occasion when the Court did not authorized his travel he, properly, refrained from traveling. Further, as I have informed the Court, counsel is confident that the charges against Mr. Osman will be resolved pursuant to a favorable plea disposition – thus, Mr. Osman has no incentive to abscond. Indeed, as the Court is aware, Mr. Osman has five children, a spouse, and a life and employment in Minnesota. Thus, there is simply no incentive for Mr. Osman not to return to the jurisdiction, thereby jeopardizing his and his family's future, as well as the monies and properties that secure his bond.

Thus, for all the reasons stated herein, I respectfully request the Court permit Mr. Osman to travel with his family to Niagara Falls (beginning at the signing of this order and returning on or before July 14, 2007) and, if necessary cross into Canada. Because the proposed travel is imminent, I respectfully request the Court respond to this request as soon as practicable.


Respectfully Submitted,



Francisco E. Celedonio, Esq.

The application for bail modification is denied insofar as it would permit travel to Canada. While Mr. Osman has ~~thus far~~ complied with the bail conditions, the risks of travel to a foreign country are of a whole different kind than those tolerated to date. Mr. Osman and his family may take their trip, but ~~must~~ ^{Mr. Osman} must remain in the United States and he must provide 24-hour contact information to pre-trial services before his departure.

SO ORDERED


KENNETH M. KARAS U.S.D.J.
6/25/07